

EXHIBIT 18

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
PLAINTIFF ALYAS; PLAINTIFF MARCOS;
PLAINTIFF AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; DOROTHY A.
FINK, in her official capacity as Acting Secretary
of Health and Human Services,

Defendants.

Case No. C25-255 JNW

**DECLARATION OF PLAINTIFF
ALYAS**

DECLARATION OF PLAINTIFF ALYAS – 1
(No. C25-255 JNW)

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DECLARATION OF ALYAS

I, Alyas, declare as follows:

1. I am 35 years old, and I am of sound mind.
2. I was scheduled to travel as a refugee to the United States on February 3, 2025 through the Direct Access Program for U.S.-Affiliated Iraqis (DAP). I first applied to the program more than a decade ago.
3. I learned on January 21, 2025 from IOM my travel to the United States has been cancelled because of the Trump Administration's refugee suspension.
4. I live in Sinjar City, Iraq.
5. I am a citizen of Iraq.
6. I am married, and my wife and I have one son who is three years old.
7. Most of my immediate family lives in the United States in Nebraska. My wife, my child, and I were planning to reunite with them.
8. I had planned for my family to live with one of my brothers in Nebraska. My brother is a United States Citizen, and he has been living in the United States since about 2015. He supported the U.S. mission in Iraq, and he came to the U.S. through the Special Immigrant Visa program. My brother lives with his wife and his two children.
9. My parents and my other brother also live in the same city in Nebraska. They arrived in the United States as refugees in about 2023. They have applied for lawful permanent resident status.
10. In Iraq my life is in danger because I am Yazidi. Yazidis have been persecuted in Iraq for many years based on our status as a religious minority group. Many people in Iraq

call us devil-worshippers. For many years, Yazidis have been targeted by ISIS, Al Qaeda, and other groups. In about 2008, I attended university in Mosul, Iraq. At the time, Al Qaeda was active in the area and frequently attacked Yazidis. To get to the university, my friends and I would take buses from Yazidi-majority villages to Mosul. One day, one of these buses was attacked and Yazidi students on it were killed. One of my friends was kidnapped, killed, and his body was thrown in the streets. After that, I left the university and didn't return for years. Many other Yazidi students left as well. It was a very scary time for me. I was worried I would be captured and killed if I continued to study.

11. Because my life was in danger, I applied for refugee status around 2011.
12. Later, I got married, and I added my wife to my case. After my wife and I had our son, I added him to the case as well.
13. I had an interview on or about July 30, 2024.
14. I had medical exams in about August or September of 2024.
15. I received conditional approval of my refugee status on or about December 22, 2024.
16. In January 2025, I had a cultural orientation.
17. I was scheduled to travel on February 3, 2025. IOM told me they bought our tickets and they provided me with the flight numbers and information about what to expect when we traveled.
18. On January 21, 2025, IOM called me to say that my family and I could not travel anymore. They apologized and told me that our flights were cancelled because of the U.S. suspension of refugee admissions. They told me that I may have to repeat security checks and other checks because of the suspension. Before I got the phone

call from IOM, my family and I had already packed our bags and we were ready to leave.

19. This is a very difficult situation to go through. I thought we had finally reached the end of the process after all these years, and we would be able to come to safety in the United States. I thought I would see my parents and brothers again.
20. I am in a bad psychological state now. I had anxiety before, and now it is much worse. Sleeping and eating are both very difficult for me right now. I started smoking again.
21. My wife tells me she is also suffering psychologically. I noticed that she also has trouble sleeping now. But we avoid discussing the fact that our travel was cancelled because it is really hard on us, and we cannot change it.
22. I had to quit my job last year in order to finish refugee processing. For my job, I had to travel a lot, and I could not continue to work and attend all the refugee appointments required before travel to the U.S. My family and I have been surviving off our savings in anticipation of traveling to the U.S. soon.
23. In the United States, one of my brothers owns a small construction/renovation company, and my other brother also works for the company. I'm skilled in this work, and I was planning to work with them when I arrived in the United States.
24. I also hoped to study again in the United States. I used to be an electrician and HVAC technician, and I had hoped to attend community college and become a licensed electrician and HVAC technician.
25. I was looking forward to having the freedom to practice my religion in the United States without fear for my life.

26. And I looked forward to being reunited with my family and ensuring that my son could grow up near my family. My son has two cousins in Nebraska who are close in age to him, and I was looking forward to seeing them grow up together.
27. I am very close to my parents. We have now been apart for many months since they went to the United States. I talk to my parents daily and they try to console me as my family and I try to get through this difficult time.
28. My parents are very close to my son. Before they moved to the United States, my parents lived with me and my family. My parents took care of him. My son tells me that he misses his grandparents and asks when we'll see them. I don't know what to say.
29. My mother told me that she was preparing for our arrival. She bought toys for my son, and she talked to him about them – a new turtle and mouse.
30. I feel so upset that my family is being kept apart by the refugee suspension. I don't know how much longer I'll have to wait to see my family, and I'm losing hope.
31. I fear that if my real name becomes public in this lawsuit, my family and I will be in greater danger in Iraq. I am aware that Yazidis in Iraq are regularly kidnapped, killed, disappeared, and otherwise harmed, as are their supporters. I fear that I will be targeted for speaking publicly about the repression of Yazidis in Iraq.
32. I also fear disclosing my name because Iranian-backed militias and armed groups in the government target people who have affiliations with the United States. I fear that my family and I will be targeted and harmed if people in Iraq find out that we are trying to go to the United States.

33. It is for these reasons that I have not told anyone outside of my family that I applied for refugee status and that I am trying to bring my wife and son with me to the United States. Even when we used to go to the U.S. embassy for refugee appointments, we took precautions to avoid people seeing us entering and exiting a U.S. government building.
34. I fear that if my real name becomes public in this lawsuit, my pending refugee application could be jeopardized. My application remains pending and is in final stages of processing, and I do not want my participation in the lawsuit to delay or prevent me and my family from coming to safety in the United States.
35. For these reasons, I believe that my personal security and that of my family necessitates that I be allowed to use a pseudonym in this case.
36. I am willing to serve as a class representative on behalf of those who are similarly situated to me who are trying to seek safety in the United States through the refugee program.
37. I know that if the class is certified, I will be representing more than just myself in this case. I will be representing the interests of other refugees. I understand what being a class representative means.
38. I want to help everyone in my situation because my family and I have suffered greatly, and there are so many others who are suffering under similar circumstances. I am willing to be actively involved in this lawsuit as a class representative and to work with my attorneys to help all of the class members.

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed in Sinjar City, Iraq on February 8, 2025

REDACTED